

CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

AUDIT CHECKLIST CONTENTS

Cover Page and Acronym/Abbreviation List

Section I

Data Review

Section II

IU File Evaluation

Section III

Observations and Concerns

Attachment A

Pretreatment Program Status Update

Attachment B

Pretreatment Program Profile

Attachment C

Legal Authority Review Checklist

Attachment D

Worksheets

Site Visit Data Sheet

WENDB Data Entry Worksheet

PCA Required ICIS Data Elements Worksheet

RNC Worksheet

Attachment D

Supporting Documentation

Control Authority (CA) name and address

Date(s) of audit

Treatment Plant Name

NPDES Permit Number

Effective Date

Expiration
Date

Permit
Reviewed?

AUDITOR(S)

Name

Title/Affiliation

Telephone Number

Email Address

CA REPRESENTATIVE(S)

Name

Title/Affiliation

Telephone Number

Email Address

*Identified program contact

ACRONYM AND ABBREVIATION LIST

Acronym/Abbreviation	Term
AO	Administrative Order
BMP	Best management practices
BMR	Baseline Monitoring Report
CA	Control Authority
CERCLA	Comprehensive Environmental Remediation, Compensation and Liability Act
CFR	<i>Code of Federal Regulations</i>
CIU	Categorical Industrial User
CSO	Combined sewer overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DMR	Discharge Monitoring Report
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
FDF	Fundamentally different factors
FTE	Full-time equivalent
FWA	Flow-Weighted Average
gpd	Gallons per day
ICIS	Integrated Compliance Information System
IU	Industrial User
IWS	Industrial Waste Survey
mgd	Million gallons per day
MSW	Municipal solid waste
N/A	Not applicable
ND	Not determined
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
NSCIU	Nonsignificant Categorical Industrial User
O&G	Oil and grease
PCA	Pretreatment Compliance Audit
PCI	Pretreatment Compliance Inspection
PCS	Permit Compliance System

ACRONYM AND ABBREVIATION LIST (CONTINUED)

Acronym/Abbreviation	Term
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
QA/QC	Quality assurance/quality control
RCRA	Resource Conservation and Recovery Act
RIDE	Required ICIS Data Element
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
SUO	Sewer Use Ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TMDL	Total maximum daily load
TOMP	Toxic Organic Management Plan
TRC	Technical Review Criteria
TRE	Technical Review Evaluation
TRIS	Toxics Release Inventory System
TSDF	Treatment, Storage, and Disposal Facility
TTO	Total toxic organics
UST	Underground Storage Tank
WENDB	Water Enforcement National Data Base
Y/N	Yes or no

GENERAL INSTRUCTIONS

1. As noted in the Introduction, the auditor should review a representative number of SIU files. Section II of this checklist provides space to document five IU files. This should not be construed to mean that five is an adequate representation of files to review. The auditor should make as many copies of Section I as needed to document a representative number of files according to the discussion in the Introduction.
2. The auditor should ensure that during the audit, he or she follows up on any and all violations noted in the previous inspection, annual report, or during the course of the audit.
3. Throughout the course of the evaluation, the auditor should look for areas in which the CA should improve the effectiveness and quality of its program.
4. Audit findings should clearly distinguish between violations, deficiencies, and effectiveness issues.

SECTION I: DATA REVIEW

INSTRUCTIONS: Complete this section on the basis of CA activities to implement its pretreatment program. Answers to these questions could be obtained from a combination of sources including discussions with CA personnel, review of general and specific IU files, IU site visits, review of POTW treatment plants, among others. Attach documentation where appropriate. Specific data might be required in some cases.

- Write ND (Not Determined) beside the questions or items that were not evaluated during the audit.
- Use N/A (Not Applicable) where appropriate.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. a. Has the CA made any substantial changes to the pretreatment program that were not reported to the Approval Authority (e.g., legal authority, less stringent limits, multijurisdictional situation)?
If yes, discuss.

Yes	No
	x

b. Is the CA in the process of making any substantial modifications to any pretreatment program component (including legal authority, less stringent local limits, and required pretreatment provisions from the 2005 revisions to the General Pretreatment Regulations, multijurisdictional situation, and others)?
If yes, describe.

Yes	No
x	

Including the required Streamlining Requirement. See draft ordinance.

c. Has the CA made any nonsubstantial changes to the pretreatment program (i.e., pH limit modification, reallocation of the maximum allowable headworks loading, and such)?

Yes	No
	x

If yes, describe.

SECTION I: DATA REVIEW (CONTINUED)

A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]

1. d. Has the CA amended its pretreatment program to include the following components required under the 2005 amendments to the General Pretreatment Regulations:

- Slug control requirements in control mechanisms. [40 CFR 403.8(f)(1)(iii)(B)(6)]
- Notification requirements to include changes that might affect the potential for a slug discharge. [40 CFR 403.8(f)(2)(vi)]
- Revised SNC definition. [40 CFR 403.8(f)(2)(viii)]
- Clarification that SIU reports must include any applicable BMP compliance information [40 CFR 40.12(b), (e), (h)]
- SIU control mechanisms must contain any BMPs required by a Pretreatment Standard, local limits, state, or local law. [40 CFR 403.8(f)(1)(iii)(B)(3)]
- Record-keeping requirements for BMPs. [40 CFR 403.12(o)]
- Clarification that CAs that perform sampling for SIUs must perform any required repeat sampling and analysis within 30 days of becoming aware of a violation. [40 CFR 403.12(g)(2)]
- Modifications to the sampling requirements. [40 CFR 403.12(g)]
- Requirement to report all monitoring results. [40 CFR 403.12(g)]

Yes	No
	x
	x
	x
	x
	x
	x
	x
	x

If not, when?

Draft ordinance and fee study ongoing. Likely in the next 3 years.

e. Has the CA adopted or does the CA plan to adopt any of the optional measures provided by the 2005 amendments to the General Pretreatment Regulations?

Yes	No
	X

If yes, check which ones.

	Issuance of monitoring waivers for pollutants that are not present [40 CFR 403.8(f)(2)(v) and 403.12(e)(2)]
	Issuance of general control mechanisms to regulate multiple industrial dischargers with similar wastes [40 CFR 403.8(f)(1)(iii)(A)]
	Using BMPs as an alternative to numeric local limits [40 CFR 403.3(e), 403.5(c)(4), 403.8(f), 403.12(b), (e), and (h)]
	Authority to implement alternative sampling, reporting, and inspection frequencies for NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)(B), 403.8(f)(6), 403.12(e)(1), 403.12(g), (i), and (q)]
	Authority to implement alternative sampling, reporting, and inspection frequencies for middle-tier CIUs [40 CFR 403.8(f)(2)(v)(C), 403.12(e)(3), and 403.12(i)]
	Authority to implement equivalent concentration limits for flow-based standards [40 CFR 403.6(c)(6)]
	Authority to implement equivalent mass limits for concentration-based standards [40 CFR 403.6(c)(5)]

SECTION I: DATA REVIEW (CONTINUED)

A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]

2. a. Are there any planned changes to the POTW's treatment plant(s)?

Yes

No

If yes, describe.

Yes

No

b. Are these changes to the treatment plant(s) due to pretreatment issues?

If yes, what were the issues?

B. LEGAL AUTHORITY [403.8(f)(1)]

1. a. Are there any contributing jurisdictions discharging wastewater to the POTW?

Yes

No

X

If yes, complete questions b–e.

b. List the contributing jurisdictions. West Hollywood, Beverly Hills, Culver City, San Fernando

c. Does the CA have an agreement in place that addresses pretreatment program responsibilities?

Yes

No

x

d. Is the CA or the contributing jurisdiction responsible for the following:

	CA Responsibility	Contributing Jurisdiction Responsibility
Updating the IWS		x
Notifying IUs of requirements		x
Issuance of control mechanisms		x
Receiving and reviewing IU reports		x
Conducting inspections		x
Conducting compliance monitoring		x
Enforcement of Pretreatment Standards and Requirements		x

SECTION I: DATA REVIEW (CONTINUED)

B. LEGAL AUTHORITY (continued) [403.8(f)(1)] (continued)

e. Has the CA had any problems with implementation of its pretreatment program within the contributing jurisdictions?

Yes

No

x

If yes, explain.

2. a. Has the CA updated its legal authority to reflect the 2005 General Pretreatment Regulation changes?

Yes

No

x

b. Did all contributing jurisdictions update their SUOs to be as stringent as the receiving POTW?

x

c. Did the CA update its procedures and ERP to implement the changes in its SUO?

x

Explain

County ordinance references the Federal regulations and are implemented just not reinstated yet until the draft ordinance is approved.

3. Does the CA experience difficulty in implementing its legal authority [i.e., SUO, interjurisdictional agreement (e.g., permit challenged, entry refused, penalty appealed)]?

Yes

No

x

If yes, explain.

SECTION I: DATA REVIEW (CONTINUED)

C. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)]

1. a. How does the CA define SIU? (Is it the same in contributing jurisdictions? Is it different from the federal definition at 40 CFR 403.3(v)?)

Same as federal.

b. If the CA has implemented the middle-tier CIU provisions, how does the CA define *middle-tier CIU*?

No.

c. If the CA has implemented the NSCIU provisions, how does the CA define *NSCIU*?

No.

2. How are SIUs identified and categorized (including those in contributing jurisdictions)?

Application received for tenant improvement work and are evaluated and permitted accordingly. Canvassing during city visits.

Discuss any problems.

3. a. How and when does the CA update its IWS to identify new IUs (including those in contributing jurisdictions)?

Tenant improvement with Building and Safety, Drive by , routine inspections/sampling events, City visits. Internet searches

b. How and when does the CA identify changes in wastewater discharges at existing IUs (including those in contributing jurisdictions)? When permits come up for renewal we check for water bills to see if any moves up to SIU. Routine inspections/sampling events

SECTION I: DATA REVIEW (CONTINUED)

C. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)] (continued)

4. How many IUs are identified by the CA in each of the following groups?

a.	6	SIUs (as defined by the CA) [WENDB – SIUS, RIDE – SIUs]
		CIUs, excluding middle-tier CIUs and NSCIUs [WENDB – CIUS, RIDE - CIUs]
		Middle-tier CIUs** (specify below)
	4	Noncategorical SIUs
b.	150 Local each city roughly	Other regulated nonsignificant IUs (specify)
		Noncategorical nonsignificant IUs
		NSCIUs**, excluding zero-discharging CIUs [as defined by 40 CFR 403.3(v)(2)] (specify below)
		Zero-discharging CIUs** (specify below)
c.		TOTAL

**** The following section is to be completed only if the POTW has adopted middle-tier permitting [40 CFR 403.3(v), 403.8(f)(2)(v)(C), 403.12(e)(3)], general control mechanisms [40 CFR 403.8(f)(1)(iii)(A)], or NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)]. In addition the POTW's program must be revised and approved for these classifications before they can be used.**

List of NSCIUs and zero-discharging CIUs:

List of Middle-Tier CIUs:

If middle-tier CIU classification is used, what is 0.01% of the POTW's dry-weather capacity? _____

List of SIUs with general control mechanisms:

SECTION I: DATA REVIEW (CONTINUED)

D. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]

<p>1. a. How many and what percent of the total SIUs are <u>not</u> covered by an existing unexpired permit, or other individual control mechanism? [WENDB – NOCM, RIDE – SIUs without Control Mechanisms] [RNC – II]</p> <p style="text-align: right; margin-right: 20px;">0 %</p> <p>b. Has the CA implemented any general control mechanisms? No.</p> <p>c. If yes, how many SIUs (as defined by the CA) are covered by a general control mechanism? 0 List the types of SIUs covered under a general control mechanism:</p> <p>d. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism or extended beyond 5 years? [RNC – II] 0</p> <p>If any, explain.</p>									
<p>2. a. Do any UST), CERCLA, RCRA corrective action sites and/or other contaminated groundwater sites discharge wastewater to the CA? Yes</p> <p>b. How are control mechanisms (specifically limits) developed for these facilities?</p> <p>Discuss</p> <p>Allowed if it meets local limits and will be under an industrial waste permit. Similar to response to City of LA.</p>									
<p>3. a. Does the CA accept any waste by truck, rail, or dedicated pipe (including septage)?</p> <p>b. Is any of the waste hazardous as defined by RCRA?</p> <p>c. Does any waste accepted via truck, rail, or dedicated pipe meet the CA's SIU definition?</p> <p>Food trucks allowed to discharge into a grease interceptor. None in the 4 represented cities. Mobile car washes can dump at the existing clarifier onsite or at car washes that agree to take it within our jurisdiction.</p> <p>d. Describe the CA's program to control hauled wastes including a designated discharge point (e.g., number of points, control/security procedures). [403.5(b)(8)]</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Yes</th> <th style="width: 50%;">No</th> </tr> </thead> <tbody> <tr> <td></td> <td style="text-align: center;">x</td> </tr> <tr> <td></td> <td style="text-align: center;">x</td> </tr> <tr> <td></td> <td style="text-align: center;">x</td> </tr> </tbody> </table>	Yes	No		x		x		x
Yes	No								
	x								
	x								
	x								

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. What limits (categorical, local, other) does the CA apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.1(b)(1)]

2. How does the CA keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]
Regulatory affairs section for state regulations, P3S conference, Waterboard notifications

3. Local limits evaluation: [403.8(f)(4); 122.21(j)(2)(ii)]

We follow City of LA local limits.

a. For what pollutants have local limits been set?

b. How were these pollutants selected?

c. What was the most prevalent/most stringent criteria (e.g., NPDES permit requirements, plant inhibition, and/or sludge disposal requirements) for the limits?

d. Which allocation method(s) were used?

e. What was the limit basis (i.e., instantaneous maximums, daily maximums, or other) for the local limits?

f. When was the CA's last local limits evaluation? What was the approval date?

g. Has the CA identified any pollutants of concern beyond those in its local limits?

If yes, how has this been addressed?

Yes	No

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS (continued)

4. What challenges, if any, were encountered during local limits development and/or implementation?

F. COMPLIANCE MONITORING

1. a. How does the CA determine adequate IU monitoring (sampling, inspecting, and reporting) frequencies?

We follow the frequency of sampling and reporting frequencies of the City of LA for the SIUs.

b. Is the frequency established above more, less, or the same as required? Same
Explain any difference.

c. Does the CA perform IU monitoring in lieu of requiring IUs to conduct self-monitoring? If yes, list IUs.
CA does not perform IU monitoring in lieu of IU self-monitoring.

2. In the past 12 months, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)] [RNC - II]

(Define the 12-month period ___Aug 2020___ to ___August 2021___.)

a. Not sampled or not inspected at least once [WENDB – NOIN]

6	100	%
---	-----	---

b. Not sampled at least once [RIDE – SIUs Not Sampled]

6	100	%
---	-----	---

c. Not inspected at least once (all parameters)? [RIDE – SIUs Not Inspected]

6	100	%
---	-----	---

If any, explain. Indicate how the percentage was determined (e.g., actual, estimated).

Self-monitoring sampling was received on time. CA sampling and onsite inspections not done this period.

County Health Pandemic Safety Protocols as implemented by Public Works limited onsite indoor inspections. Expected to be modified in 4th quarter and sampling by CA Authority will begin.

Phone call inspections were conducted. Interviews were conducted to confirm if any changes in operation occurred. Documentation such as manifests, digital photographs, maintenance records of pretreatment devices, and copies of any other pertinent records was requested.

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

3. a. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements as listed in the CA's last pretreatment program report: [WENDB, RIDE] [RNC – II]

SNC Evaluation Period 2020

0	%	Applicable Pretreatment Standards and reporting requirements
0	%	Self-monitoring requirements
0	%	Pretreatment compliance schedule(s)

*SNC defined by:

POTW	
EPA	x

b. Are any of the SIUs that were listed as being in SNC in the most recent pretreatment report still in SNC status? If yes, list SIUs.

c. Indicate the number of SIUs that have been in 100% compliance with all Pretreatment Standards and Requirements.

Evaluation Period: Jan 2020 to Dec 2020

Number of SIUs: 6

Names of SIUs:

Pharmavite, Pharmavite, Puretek, Ohmega Technologies, Dusty Blue Industries, Beverly Hills R/O Plant

We sampling will be performed by the Control Authority once the County Health Officer modifies the pandemic policy. Expected to sample in 4th quarter to meet the minimum federal requirement this year. All self-monitoring reports were conducted and found to be in compliance.

4. What does the CA's basic inspection include? (process areas, pretreatment facilities, chemical and hazardous waste storage areas, chemical spill prevention areas, hazardous-waste handling procedures, sampling procedures, laboratory procedures, and monitoring records) [403.8(f)(2)(v)&(vii)]

File review to see what was approved, contact person walk-through, see any changes, survey on flow rates, process, document review, hazardous waste handling procedures, storage, spill containments. Our IW requires a review of Products made/Service provided, Description of operations, Type and quantity of IW and method of disposal, Hours of operation, Location of IW facility, type and volume, Pretreatment type, Treatment methods, Chemical storage location and construction material and detail, Waste storage, location and construction and detail and material stored, Outside operations, Surface runoff, Production process discharge, Off-site waste Disposal, Stormwater and type of permit and details, Slug discharge evaluation and detailed questions and sketch.

Request a copy of the CA's inspection form, if applicable.

5. Who performs the CA's compliance monitoring analysis?

- Metals
- Cyanide
- Organics
- Other (specify)

Performed by: CA/Contract Laboratory Name
Advanced Technology Laboratory Inc dba Asset Laboratories

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

6. What QA/QC techniques does the CA use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [403.8(f)(2)(vii)]

Check all that are applicable.

QA/QC for Sampling		QA/QC for Analysis	
Gloves	x	Sample Splits	x
Chain-of-custody forms	x	Sample Blanks	
New Sampling Tubes	x	Sample Spikes	
Field Blanks		Other:	
Other: Drive to lab or meet at set location to give to lab			

7. Discuss any problems encountered in identification of sample location, collection, and analysis.

No.

8. a. Did any IUs notify the CA of a hazardous waste discharge since the last PCI or PCA?

[403.12(j)&(p)]

Yes	No
	x

If yes, summarize.

b. How does the CA notify its users of the hazardous-waste reporting requirement? When was the last time the CA notified its IUs?

Notification indicated in the permit and when permit is renewed/issued.

9. a. How and when does the CA evaluate/reevaluate SIUs for the need for a slug discharge control plan? [403.8(f)(2)(vi)]

Slug plans are reevaluated at time of permit renewal and at time of inspection the questions are asked such as any modifications to the Industrial Waste approved plans, Industrial Waste process, pretreatment system, operations and to the Industrial Waste discharge.

List SIUs required to have a slug discharge control plan: All six SIUs

Yes	No
x	

b. For all existing SIUs identified as significant before November 14, 2005, or within a year of becoming an SIU (whichever is later), has the POTW performed the evaluation to determine whether each SIU needs a plan or action to control slug discharges?

If not, which SIUs have not been evaluated?

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT

1. What is the CA's definition of SNC? [403.8(f)(2)(viii)]

See ordinance referred generally as reference to Federal regulations.

2. ERP implementation: [403.8(f)(5)]

a. Has the ERP been adopted by the POTW? ERP was provided to the POTW during previous PCI audits

b. Has the ERP been approved by the Approval Authority? Yes believe so, but no documentation. Was provided in previous PCI audits.

c. Does the ERP describe how the CA will investigate instances of noncompliance? Yes

d. Does the ERP describe types of escalating enforcement responses and the time frames for each response? Yes

e. Does the ERP identify the title of official(s) responsible for implementing each type of enforcement response? Yes

f. Does the ERP reflect the CA's responsibility to enforce all applicable Pretreatment Standards and Requirements?
Yes

g. Is the ERP effective, and does it lead to timely compliance? Provide examples if any are available. Yes

3. a. Does the CA use compliance schedules? [403.8(f)(1)(iv)(A)]

b. If yes, are they appropriate? Provide a list of SIUs on compliance schedules.

Have not had to use it yet.

Yes	No
x	

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)				
<p>4. Did the CA publish a list of all SIUs in SNC in a daily newspaper of general circulation that provides meaningful public notice within the jurisdiction served by the POTW in the previous year? [403.8(f)(2)(viii)]</p> <p>If yes, attach a copy.</p> <p>If no, explain. All SIUs were in compliance last reporting period.</p>	Yes	No		
		x		
<p>5. a. How many SIUs are in SNC with self-monitoring requirements and were not inspected (in the four most recent full quarters)?</p> <p>b. How many SIUs are in SNC with self-monitoring requirements and were not sampled (in the four most recent full quarters)?</p>			0	
			0	
<p>6. a. Did the CA experience any of the following caused by industrial discharges?</p>				
<ul style="list-style-type: none"> Interference Pass through Fire or explosions (flashpoint, and such) Corrosive structural damage Flow obstruction Excessive flow rates Excessive pollutant concentrations Heat problems Interference due to oil and grease (O&G) Toxic fumes Illicit dumping of hauled wastes Worker health and safety Other (specify) 	Yes	No	Unknown	Explain

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)

b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I]

Yes

No

7. a. Did the POTW have any sanitary sewer overflows since the last PCI or PCA?

Yes

No

b. If yes, how many were due to nondomestic waste issues (O&G blockages)?

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How is confidential information handled by the CA? [403.14]

Information is not disseminated to the public. File is marked confidential in our database. Evaluation of what can be released is reviewed to determine.

2. How are requests by the public to review files handled?

We have an online review link that the public can view documents such as inspections and reports. If the information is not available online they can submit a request to review a file and if the file has not been marked secured the public can review the documents at our public counter.

SECTION I: DATA REVIEW (CONTINUED)

H. DATA MANAGEMENT/PUBLIC PARTICIPATION (continued)

3. Does the CA accept electronic reporting? If no, does it plan to do so?

No. No plans to accept in near future.

4. Describe whether the CA's data management system is effective in supporting pretreatment implementation and enforcement activities.

Yes. Transitioning in next 3 years to a custom software to allow for customer portal to pay and submit permit and view files.

5. How does the CA ensure public participation during revisions to the SUO and/or local limits? [403.5(c)(3)]

Draft ordinances posted on our website. Affected cities, industrial users, and business associations are notified of the proposed changes and ask for input and comments before reaching public hearings on ordinance changes.

6. Explain any public or community issues affecting the CA's pretreatment program.

None

7. How long are records maintained? [403.12(o)]

Documents entered into our Document Management System or is in the physical file are kept forever. Emails are subject to 2 years.

SECTION I: DATA REVIEW (CONTINUED)

I. RESOURCES [403.8(f)(3)]

1. Estimate the number of personnel (in FTEs) available for implementing the program. FTEs below are roughly for the entire Industrial Waste Program for the Unincorporated County and 37 contract cities.

Activity	FTEs	Activity	FTEs
Legal Assistance	0.05	Sample Analysis	Outside lab
Permitting	4.5	Data Analysis: Review and Response	Part of permitting
Inspections	12	Enforcement	2
Sample Collection	Part of inspection	Administration	1

Total Number of FTEs 19.5 for 37 cities/uninc area

2. Does the CA have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)

If not, explain.

Yes	No
x	

3. a. Estimate the annual operating budget for the CA's program.

\$ 2 million entire proram

b. Is funding expected to stay the same, increase, decrease (note time frame; e.g., following year, next 3 years)?

Looking to increase fees in a fee study in next 3 years

Discuss any changes in funding.

4. Discuss any problems in program implementation that appear to be related to inadequate resources.

SECTION I: DATA REVIEW (CONTINUED)

I. RESOURCES (continued) [403.8(f)(3)] (continued)

5. a. How does the CA ensure that personnel are qualified and up-to-date with current program requirements?

IW plan checkers are trained by experienced plan checkers, required to review ordinance, and federal regulations, pretreatment conferences.

IW inspectors are trained by experienced inspectors, review ordinance, federal regulations and pretreatment conferences.

There are routine in house training to inform staff on any updates or changes.

b. Does the CA have adequate reference material to implement its program?

Yes	No
x	

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

1. a. How many times was the POTW monitored in the past year?

- Metals
- Priority pollutants
- Biomonitoring
- Toxicity Characteristic Leachate Procedure (TCLP)
- Extraction Procedure (EP) toxicity
- Other (specify)

Influent	Effluent	Sludge	Ambient (Receiving Water)

b. Is this frequency less than, equal to, or more than that required by the NPDES permit?

Less	Equal	More

Explain any differences.

SECTION I: DATA REVIEW (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)

c. Is the CA reporting these results to the Approval Authority?
If yes, at what frequency?

Yes

No

2. a. Has the CA evaluated historical and current data to determine the effectiveness of pretreatment controls on the following:

- Improvements in POTW operations
- Loadings to and from the POTW
- NPDES permit compliance
- Sludge quality?
- Sludge disposal options?

Yes

No

b. Has the CA documented these findings?

Explain. (Attach a copy of the documentation, if appropriate.)

3. If the CA has historical data concerning influent, effluent, and sludge sampling for the POTW, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?)

Discuss on a pollutant-by-pollutant basis.

SECTION I: DATA REVIEW (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)

4. Has the CA investigated the sources contributing to current pollutant loadings to the POTW (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)?

Yes

No

If yes, what was found?

5. a. Has the CA implemented any kind of public education program?

Yes

No

x

b. Are there any plans to initiate such a program to educate users about pollution prevention?

x

Explain.

Time of inspection inspector will provide advice and education site to reduce stormwater pollution. Industrial/Commercial Stormwater Program (handled in unincorporated area only) conducted by the same inspector at the time of the industrial waste inspection.

6. What efforts have been taken to incorporate pollution prevention into the CA's pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)?

At time of inspection, inspector would provide education to site contact.

Fats Oils and Grease Program inspected annually.

Dental offices are permitted. New and existing dental offices have come in. Will need to issue notices for those that have not submitted for exemption and permitting in the next few months.

7. Does the CA have any documentation concerning successful pollution-prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)?

Yes

No

x

Explain.

SECTION I: DATA REVIEW (CONTINUED)

K. ADDITIONAL EVALUATIONS/INFORMATION

SECTION I COMPLETED
BY:

TITLE:

DATE:

TELEPHONE:

SECTION II: IU FILE EVALUATION

Instructions: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on all problems identified and any other areas of interest. Where possible, all CIUs (and SIUs) added since the last PCI or PCA should be evaluated. Make copies of this section to review additional files as necessary.

IU IDENTIFICATION

FILE _____ Industry name and address	Type of industry SIC Code: NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments		

FILE _____ Industry name and address	Type of industry SIC Code: NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments		

SECTION II: IU FILE EVALUATION (CONTINUED)

IU IDENTIFICATION (continued)		
FILE _____ Industry name and address	Type of industry SIC Code: NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments		
FILE _____ Industry name and address	Type of industry SIC Code: NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments		

SECTION II: IU FILE EVALUATION (CONTINUED)

IU IDENTIFICATION (continued)		
FILE _____ Industry name and address	Type of industry SIC Code: NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments		
General Comments		

SECTION II: IU EVALUATION (CONTINUED)

Industry Name					INSTRUCTIONS: Evaluate the contents of selected IU files; place an emphasis on SIU files. Use N/A (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Provide comments in the comment area at the bottom of the page for all violations, deficiencies, and/or other problems as well as for any areas of concern or interest noted. Enter a comment number in box and in the comment area at the bottom of the page, followed by the comment. Comments should delineate the extent of the violation, deficiency, and/or problem. Attach relevant copies of IU file information for documentation. Where no comment is needed, or if the item was found to be satisfactory, enter (check) to indicate area was reviewed. The evaluation should emphasize any areas where improvements in quality and effectiveness can be made.		
File	File	File	File	File	IU FILE REVIEW		Reg. Cite
A. ISSUANCE OF IU CONTROL MECHANISM							
					1. Control mechanism application form		
					2. Fact sheet		
					3. Issuance or reissuance of control mechanism		403.8(f)(1)(iii)
					a. Individual control mechanism		
					b. General control mechanism		403.8(f)(1)(iii)(A)
					4. Control mechanism contents		403.8(f)(1)(iii)(B)
					a. Statement of duration (§ 5 years)		403.8(f)(1)(iii)(B)(1)
					b. Statement of nontransferability w/o prior notification/approval		403.8(f)(1)(iii)(B)(2)
					c. Applicable effluent limits (local limits, categorical standards, BMPs)		403.8(f)(1)(iii)(B)(3)
Comments							

SECTION II: IU EVALUATION (CONTINUED)

File —	File —	File —	File —	File —	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
					d. Self-monitoring requirements	403.8(f)(1)(iii)(B)(4)
					• Identification of pollutants to be monitored	
					• Process for seeking a waiver for pollutant not present or expected to be present (CIUs only)	
					• Is the monitoring waiver certification language included in the control mechanism? (Y/N)	403.12(e)(2)(v)
					• Are conditions for reinstating monitoring requirements if pollutants not present are detected in the future included in the permit? (Y/N)	403.12(e)(2)(vi)
					• Sampling frequency	
					- Has the POTW reduced the IU's monitoring requirements for pollutants not present or expected to not to be present? (Y/N)	
					• Sampling locations/discharge points	
					• Sample types (grab or composite)	
					• Reporting requirements (including all monitoring results)	
					• Record-keeping requirements	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File _____	File _____	File _____	File _____	File _____	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
					e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(B)(5)
					f. Compliance schedules/progress reports (if applicable)	403.8(f)(1)(iv)
					g. Notice of slug loadings	403.12(f)
					h. Notification of spills, bypasses, upsets, etc.	403.16, 403.17
					i. Notification of significant change in discharge	403.12(j)
					j. Notification of change affecting the potential for a slug discharge	403.8(f)(2)(vi)
					k. 24-hour notification of violation/resample requirement	403.12(g)(2)
					l. Slug discharge control plan conditions, if determined by the POTW to be necessary	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File _____	File _____	File _____	File _____	File _____	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
					5. Issuance of General Control Mechanisms	403.8(f)(1)(iii)(A)
					a. Involve the same or similar operations	
					b. Discharge the same types of wastes	
					c. Require the same effluent limitations	
					d. Written request by the IU for coverage by a general control mechanism including:	
					• Contact information	
					• Production processes	
					• Types of waste generated	
					• Location for monitoring all wastes covered by the general permit	
					• Any requests for a monitoring waiver for a pollutant neither present nor expected to be present	
					e. Documentation to support the POTW's determination	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File _____	File _____	File _____	File _____	File _____	IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS	
					1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
					a. Classification by category/subcategory	
					b. Classification as new/existing source	
					c. Application of limits for all regulated pollutants	
					d. Classification as an NSCIU	403.3(v)(2)
					e. Documentation for the qualification to be classified as NSCIU	
					f. Documentation of reasons for supporting sampling waiver for pollutant not present	403.12(2)(iv)
					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
					4. Application of BMPs	403.8(f)(1)(iii)(B)(3)
					5. Calculation and application of production-based standards	403.6(c)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File _____	File _____	File _____	File _____	File _____	IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS (continued)	
					6. Calculation of equivalent mass limits for concentration limits	403.6(c)(5)
					a. IU has demonstrated or will demonstrate substantially reduced water usage	403.6(c)(5)(i)(A)
					b. IU uses control and technologies adequate to achieve compliance	403.6(c)(5)(i)(B)
					c. IU has provided information regarding actual average daily flow	403.6(c)(5)(i)(C)
					d. IU does not have variable flow rates, production levels, or pollutant levels	403.6(c)(5)(i)(D)
					e. IU has consistently complied with applicable categorical requirements	403.6(c)(5)(i)(E)
					f. Did the CA use appropriate flow rates when developing limits? (Y/N)	406.3(c)(5)(iii)(A)
					g. Did the CA use the correct concentration-based limits for the applicable categorical standards? (Y/N)	403.6(c)(5)(iii)(B)
					h. Upon notification of revised production rate, did the CA reassess the mass limits? (Y/N)	
					7. Calculation of equivalent concentration limits for flow-based standards	403.6(c)(6)
					a. Is the IU subject to 40 CFR Part 414, 419, or 455? (Y/N)	
					b. Documentation that dilution is not being used as treatment? (Y/N)	
					8. Calculation and application of CWF or FWA	403.6(d)&(e)
					9. Application of most stringent limit	403.8(f)(1)(ii)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File _____	File _____	File _____	File _____	File _____	IU FILE REVIEW	Reg. Cite
					C. CA COMPLIANCE MONITORING	
					1. Inspection (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If the CA has determined a discharger to be an NSCIU	403.8(f)(2)(v)(B)
					• Evaluation of discharger with the definition of NSCIU once per year	
					b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
					• Inspect at least once every 2 years	
					2. Inspection at frequency specified in approved program	403.8(c)
					3. Documentation of inspection activities	403.8(f)(2)(v)
					4. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(vi)
					5. Sampling (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If the CA has waived monitoring for a CIU	403.8(f)(2)(v)(A)
					• Sample waived pollutant(s) at least once during the term of the control mechanism	
					b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
					• Sample and analyze IU discharge at least once every 2 years	
					6. Sampling at the frequency specified in approved program	403.8(c)
					7. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vii)
					8. Analysis for all regulated parameters	403.12(g)(1)
					9. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vii)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File _____	File _____	File _____	File _____	File _____	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES	
					1. Identification of violations	403.8(f)(2)(vii)
					a. Discharge violations	
					• IU self-monitoring	
					• CA compliance monitoring	
					b. Monitoring/reporting violations	
					• IU self-monitoring	
					– Reporting (e.g., frequency, content)	
					– Sampling (e.g., frequency, pollutants)	
					– Record-keeping	
					• Notification (e.g., slug, spill, changed discharge, 24-hour notice of violation)	
					• Slug discharge control plan	
					• Compliance schedule/reports	
					c. Compliance schedule violations	
					• Start-up/final compliance	
					• Interim dates	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File _____	File _____	File _____	File _____	File _____	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES (continued)	
					2. Determination of SNC (on the basis of rolling quarters)	403.8(f)(2)(viii)
					a. Chronic	
					b. TRC (Technical Review Criteria)	
					c. Pass through/interference	
					d. Spill/slug reporting load	
					e. Reporting	
					f. Compliance schedule	
					g. Other violations (e.g., BMPs requirements)	
					3. Response to violation	
					4. Adherence to approved ERP	403.8(f)(5)
					5. Return to compliance	
					a. Within 90 days	
					b. Within time specified	
					c. Through compliance schedule	
					6. Escalation of enforcement	403.8(f)(5)(ii)
					7. Publication for SNC	403.8(f)(2)(viii)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File _____	File _____	File _____	File _____	File _____	IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS	
					1. Self-monitoring and reporting	
					a. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
					b. Analysis of all required pollutants	403.12(g)(1)&(h)
					c. Appropriate analytical methods (40 CFR Part 136)	
					d. Appropriate sample collection methods	
					e. Compliance with sample collection holding times	
					f. Submission of BMR/90-day report	403.12(b) &(d)
					g. Periodic self monitoring reports	403.12(e)&(h)
					h. Reporting all required pollutants	403.12(g)(1)&(h)
					i. Signatory/certification of reports	403.12(l)
					j. Annual certification by NSCIUs	403.12(q)
					k. Submission of compliance schedule reports by required dates	403.12(c)
					l. Notification within 24 hours of becoming aware of violations	403.12(g)(2)
					• Discharge violation	
					• Slug load	
					• Accidental spill	
					m. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
					n. Notification of hazardous waste discharge	403.12(j)&(p)
					o. Submission/implementation of slug discharge control plan	403.8(f)(2)(vii)
					p. Notification of significant changes	403.12(j)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File _____	File _____	File _____	File _____	File _____	IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS (continued)	
					2. Compliance with all general control mechanism requirements	
					3. If the CA has classified the discharger as a middle-tier CIU	403.12(e)(3)
					<ul style="list-style-type: none"> • Categorical flow does not exceed 0.01% of the design dry-weather hydraulic capacity or 5,000 gpd (whichever is smaller) 	
					<ul style="list-style-type: none"> • Categorical flow does not exceed 0.01% of the design dry weather organic treatment capacity of the POTW 	
					<ul style="list-style-type: none"> • Categorical flow does not exceed 0.01% of the maximum allowable headworks loading for any regulated categorical pollutant 	
					4. If the CA has granted the discharger a monitoring waiver	403.12(e)(2)
					<ul style="list-style-type: none"> • Certification statements with each compliance report 	
					5. Compliance with BMR requirements, if applicable (Y/N)	
					6. If the CA has classified the discharger as an NSCIU	403.3(v)(2)
					<ul style="list-style-type: none"> • IU discharges less than 100 gpd of total categorical wastewater 	
					<ul style="list-style-type: none"> • Annual certification statements from the IU 	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS (continued)	
					7. If the CA has established equivalent mass limits for a CIU	403.6(c)(5)(ii)
					• IU is effectively operating treatment technologies to achieve compliance	
					• IU is recording the facility's flow rates	
					• IU is recording the facility's production rates	
					• IU has notified the CA whenever production rates vary	
					• IU continues to employ water conservation methods/technologies	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File _____	File _____	File _____	File _____	File _____	IU FILE REVIEW	Reg. Cite
					F. OTHER	
Comments						
SECTION II COMPLETED BY:						DATE:
TITLE:						TELEPHONE:

SECTION III: OBSERVATIONS AND CONCERNS

INSTRUCTIONS: On the basis of the information and data evaluated, summarize the observations and concerns of the audit for each program element shown below. Identify all problems or deficiencies from the evaluation of program components. Clearly distinguish between deficiencies, violations, and effectiveness issues. This is to ensure that the final report will clearly identify required actions versus recommended actions and program modifications.

Description	Regulatory Citation	Checklist Question(s)
A. CA PRETREATMENT PROGRAM MODIFICATION		
<ul style="list-style-type: none"> Status of program modifications 	403.18	I.A.1
<ul style="list-style-type: none"> Modification to the program to accommodate the 2005 General Pretreatment Regulation changes 	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi), 403.12(g)	I.A.1
B. LEGAL AUTHORITY		
<ul style="list-style-type: none"> Minimum legal authority requirements 	403.8(f)(1)	I.B.2&3
<ul style="list-style-type: none"> Adequate multijurisdictional agreements 	403.8(f)(1)	I.B.1&3

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
C. IU CHARACTERIZATION		
• Application of <i>significant industrial user</i> definition	403.3(v)(1)	I.C.1; Attach B.E.2
• Application of <i>middle-tier CIU</i> definition		
• Application of <i>NSCIU</i> definition		
• Identify and categorize IUs	403.8(f)(2)(i)&(ii)	I.C.2&3; II.B
D. CONTROL MECHANISM		
• Issuance of individual or general control mechanisms to all SIUs	403.8(f)(1)(iii)	I.D.1
• Adequate control mechanisms	403.8(f)(1)(iii)(B)	II.A.4
• Adequate control of trucked, railed, and dedicated pipe wastes	403.5(b)(8)	I.D.2&3, E.1

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS		
<ul style="list-style-type: none"> Appropriately categorize, notify, and apply all applicable pretreatment standards 	403.8(f)(1)(ii)&(iii) 403.5	II.B
<ul style="list-style-type: none"> Basis and adequacy of local limits 	403.8(f)(4); 122.21	I.E.3&4
F. COMPLIANCE MONITORING		
<ul style="list-style-type: none"> Adequate sampling and inspection frequency 	Approved program 403.8(f)(2)(ii)&(v)	I.F.1&2; II.C
<ul style="list-style-type: none"> Adequate inspections 	403.8(f)(2)(v)&(vi)	I.F.2&4; II.C.1-3
<ul style="list-style-type: none"> Adequate sampling protocols and analysis 	403.8(f)(2)(vii)	I.F. 5&6; II.C.5-9

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
F. COMPLIANCE MONITORING (continued)		
• Adequate IU self-monitoring	403.8(f)(2)(iv)	I.F.6, G.5; II.E
• Notification of changed and hazardous waste discharges	403.12(j)&(p)	I.F.8; II.D.1.b
• Evaluate the need for SIUs to develop slug discharge control plans	403.8(f)(2)(vi)	I.F.9; II.C.4
• Monitor to demonstrate continued compliance and resampling after violation(s)	403.12(g)(1)&(2) 403.8(f)(2)(vi)	II.A.4.j & II.C.5
G. ENFORCEMENT		
• Appropriate application of <i>significant noncompliance</i> definition	403.8(f)(2)(viii)	I.G.1; II.D.2; Attach B.I.1
• Develop and implement an ERP	403.8(f)(5)	I.G.2; II.D.3
• Annually publish a list of IUs in SNC	403.8(f)(2)(viii)	I.G.4; II.D.7

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
G. ENFORCEMENT (continued)		
<ul style="list-style-type: none"> Effective enforcement 	403.8(f)(5)	I.G.2.c, 5&6; II.D.1.c, 4&5
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
<ul style="list-style-type: none"> Effective data management/public participation 	403.5(c)(3); 403.12(o); 403.14	I.H
I. RESOURCES		
<ul style="list-style-type: none"> Adequate resources 	403.8(f)(3)	I.I

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
<ul style="list-style-type: none"> Understanding of pollutants from all sources 		I.J.1&3
<ul style="list-style-type: none"> Documentation of environmental improvements/effectiveness 		I.J.2
<ul style="list-style-type: none"> Integration of pollution prevention 		I.J.6
K. ADDITIONAL EVALUATIONS/INFORMATION		
SECTION II COMPLETED BY:	DATE:	
TITLE:	TELEPHONE:	

